

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

UNITED STATES OF AMERICA

NO. 3:17-CR-00169-B

v.

SAID AZZAM MOHAMAD RAHIM

GOVERNMENT EXPERT SUMMARIES

Lorenzo Vidino, Ph.D/J.D.

Dr. Vidino is the founder and director of the Program on Extremism at George Washington University, in Washington, D.C. Dr. Vidino will testify regarding several aspects relating to the Islamic State of Iraq and al-Sham (ISIS). The testimony will be based on Dr. Vidino's education and experience. This response incorporates Dr. Vidino's CV and trial transcripts of previous testimony.

Specifically, Dr. Vidino will or may testify about the following:

ISIS is a byproduct of a very complex history and iterations of the group, to include ISIS, ISIL, Dawla, Daesh, and the Islamic State. The region of Sham includes several countries in the Middle East, including Syria. There is a relationship with Hamas and other extremist groups. ISIS started as a small group lead by al-Zarqawi, who was al-Qaeda (AQ) linked. Originally, Zarqawi lead a small group which evolved from al-Qaeda to al-Qaeda in Iraq (AQI). The group started receiving funding after the invasion

of Iraq by U.S. and Coalition forces. The “Arab Spring” occurred around 2011 which started as peaceful protest and developed into a violent conflict. Abu Bakr al-Baghdadi takes leadership after Zarqawi was killed. Under Baghdadi’s leadership, he takes ISIS across the border into Syria to fight the Bashar al-Assad regime. ISIS becomes very powerful on the ground in part because it is comprised of experienced fighters and receive an influx of foreign fighters from other countries, including Europe and the U.S. More conflict between groups grows in which ISIS starts to clash with other Foreign Terrorist Organizations (FTO). ISIS conquers portions of Syria and Iraq, and calls for a “caliphate” which is a large area of land controlled by Islam and Sharia law. The caliphate is a strong propaganda piece used by ISIS, aimed at uniting Muslims around the world. ISIS used a flexible narrative to recruit, in effect “grooming” the audience to comply.

There are various sects of Islam that become involved in some respect, including Sunnis and Shiites, and Salafists. There are also various terms used by ISIS to include: jihad; mujahideen; hijra; sheikh; fatwa; foreign fighters; Sharia law and Sharia-based society. Each has a detailed meaning and an important role in extremism and ISIS. ISIS attracted between 60-70 thousand foreign fighters wanting to join the so-called caliphate, operating under sharia law which governs the affairs of the Muslim community. In the attempt to build its caliphate, ISIS sought to bring both men and women. Typically men would come as fighters and the women would become “ISIS brides,” and deliver children to further grow the caliphate. For certain followers of ISIS and extremist ideology, they

would proselytize a very strict view of Islam but their actions would often be inconsistent with that belief system. It is not unusual to find these inconsistencies.

ISIS established a territory which it promoted through aggressive online propaganda. It advertises the caliphate as both a place of harmony in which people live, work, attend school, and build a community. ISIS also advertises the caliphate as a place of strict sharia law and violence for those who oppose them. Under sharia law and life in the caliphate, a non-Muslim would have three choices: to convert to Islam; pay the “jizya” or tax; or death. ISIS tries to appeal to a vast array of people around the world, recruiting them to travel to ISIS territory and join the caliphate. ISIS also recruits people around the world to commit acts of violence in their homelands. ISIS frequently praised attacks and acts of violence on its behalf – often posting videos of beheadings, etc. The official spokesman of ISIS, Abu Mohammad al-Adnani, places a call to action for all people to travel, or stay where they are and attack the infidels or non-believers. He admonished all the supporters to act without consultation or “fatwa,” and that was an ISIS sanction on violence. This call to action had substantial effect and lead to various attacks, including the Reina nightclub attack in Istanbul, Turkey; the Promenade attack in Nice, France; the Pulse nightclub attack in Orlando, Florida.; and the attack in San Bernadino, California. Between 2014 and 2018, there were approximately 80 attacks in the west. The U.S. had the second largest number of attacks during that period.

ISIS is very successful using social media to further its goals. ISIS uses platforms such as Twitter, Facebook, Zello, and encrypted messaging platforms such as Telegram

and Viber. Much of the media was not formally affiliated with ISIS but instead produced or published by individuals around the world, acting on behalf of ISIS.

ISIS revolutionized the way to join a FTO, making it a much more informal process. Through social media and the various Internet propaganda publications and messaging platforms, ISIS developed different approaches of recruitment, from a traditional al-Qaeda model of direct interface and orders, to a non-traditional approach of distanced semi-occasional communications, to a hybrid approach of publicizing the ISIS goals and mission and recruiting people to join the group and act on its behalf without ever making connection. These are sometimes called “lone wolves” or “independent actors.” However, they are directly fulfilling ISIS mission in attacking democratic states for revenge, and by causing disruption and fear in the local population and attempting to intimidate the U.S. and Coalition forces into withdrawing from ISIS controlled territory. In essence, it is a “grassroots” organization. Some of these actors will pledge “bayat” to ISIS and commit “jihad” or “martyrdom.” According to ISIS, doing so will ensure the actor a place in heaven with honors. It will entitle the actor a reward of 77 virgins in heaven and also the ability to secure heaven for 70 of their relatives. And for those who could travel to ISIS territory, the impact it has on the area and the surrounding states is significant, as is the threat to Europe.

Dr. Vidino will also testify about certain statements made by the defendant and how those statements relate to, and further, the ISIS mission. He will discuss the important role the defendant plays in the Zello chatroom, and the significance of his

relationship with other users. He will also describe how the defendant's statements and actions, and others on the Zello chatroom, were a direct effort to recruit people on behalf of ISIS.

Gwen Dove, FBI CART Examiner

Gwen Dove is a certified Computer Analysis Response Team (CART) Examiner. As part of her duties, she conducts forensic examinations on digital evidence, and will testify that she conducted the extractions on the defendant's telephones and SIM cards. She will testify to the contents in those items as set out in the extraction reports provided to defense in discovery. Ms. Dove's bases for opinion is her education and experience. This response incorporates Ms. Dove's CV.